

CALIFORNIA COASTAL COMMISSION

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**W 14d**

Filed: 5/05/06
180th Day: Waived
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Staff: AJP-LB
Staff Report: 12/18/06
Hearing Date: 1/10-12/07
Commission Action:

STAFF REPORT: REGULAR CALENDAR**APPLICATION NUMBER:** 5-06-174**APPLICANT:** Southern California Gas Company**PROJECT LOCATION:** 400 feet northeast of the intersection of Culver and Jefferson Boulevard, Playa del Rey, City of Los Angeles (Playa Vista Planning Area).**PROJECT DESCRIPTION:** Request for after-the-fact approval of unpermitted development consisting of: repair to an existing oil well access road including the placing of filter fabric and 8 inches of fill material (crushed granite and dirt) on the roadbed, removal of fill outside original roadway prism, and restoration. The fill increased the height of the road by 1.5 feet and resulted in the encroachment of approximately 115 square feet into the surrounding area.**LOCAL APPROVALS RECEIVED:** Approval in Concept

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends that the Commission **Approve** a permit for the proposed development with special conditions regarding: 1) removal of unpermitted fill; 2) the submittal of a plan to monitor and remove invasive non-native plants from the area of unpermitted fill that is being removed, at a 3:1 ratio; 3) United States Army Corps of Engineers approval; and 4) compliance with all special conditions within 60 days of Commission approval. As conditioned, the proposed development conforms with all applicable policies of the Coastal Act. The applicant is in agreement with the staff recommendation.

Staff Note:

The proposed project was before the Commission in January 2006 (CDP application No. 5-05-209). The Commission denied the project due to the concern that there were other

possible road alternatives, that were not considered by the applicant that would potentially have less of an adverse impact on the surrounding wetlands. With the submittal of this application, and in consultation with the Department of Fish and Game, the applicant submitted a report analyzing alternative road alignments. Based in part on comments from the Department of Fish and Game and from Friends of Ballona Wetlands, who are activity involved with the restoration of portions of the wetlands, it was determined that the existing alignment would be the best alternative in terms of minimizing adverse impacts to the wetlands. Therefore, the applicant's proposed alignment is the same alignment as previously requested.

I. STAFF RECOMMENDATION:

MOTION, STAFF RECOMMENDATION AND RESOLUTION FOR 5-01-096:

Staff recommends that the Commission make the following motion and adopt the following resolution:

MOTION: *I move that the Commission approve Coastal Development Permit #5-06-174 pursuant to the staff recommendation.*

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a permit, subject to the conditions below, for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the provisions of Chapter 3 of the California Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a local coastal program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/ or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternative that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized

agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS:

1. Removal of Unpermitted Development

The applicant shall remove the unauthorized imported fill material from the access road and outside the prism of original roadway within 60 days of the issuance of this permit. The Executive Director may grant additional time for good cause.

2. Plan to Monitor the Disturbed Area and Remove Invasive Non-native Plants

A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant will submit, for the review and written approval of the Executive Director, a plan to monitor the disturbed area and to remove invasive non-native plants within the area impacted by the fill and a mitigation area surrounding the impacted area based on a mitigation ratio of 3:1 [mitigation:impact]. The plan shall be prepared by a licensed biologist or licensed landscape architect, with expertise in wetland restoration. The plan shall delineate the "impacted area" as the area subject to fill or compaction from the passage of heavy equipment and a "peripherally impacted area" no less than five feet wide surrounding the area directly subject to fill or compaction. The plan shall include procedures for identification and removal of non-native invasive plants that may be found in the impacted and peripherally impacted areas. All plant removal shall be by hand. Areas showing evidence of compaction shall be loosened with hand tools. The plan shall be reviewed and approved by the California Department of Fish and Game prior to being submitted to the Executive Director for review and approval. The plan shall include the following:

1. Invasive plants are those identified in the California Native Plant Society, Los Angeles -- Santa Monica Mountains Chapter handbook entitled Recommended List of Native Plants for Landscaping in the Santa Monica Mountains, January 20, 1992, those species listed by the California Exotic Plant Pest Council on any of their watch lists as published in 1999, and those otherwise identified by the Department of Fish and Game or the United States Fish and Wildlife Service.
2. All non-native invasive plants shall be removed with hand tools
3. No herbicides shall be employed.

B. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

C. Two years from the date of issuance of Coastal Development Permit No. 5-06-174, the applicant shall submit for the review and approval of the Executive Director, a monitoring report, prepared by a licensed biologist or landscape architect with expertise in wetland restoration that indicates the progress of the natural revegetation of the impacted area. The monitoring report shall include photographic documentation of plant species, plant coverage and an evaluation of the natural restoration of the site.

If the monitoring report indicates that the area has not naturally revegetated with native species typically found in the area, or that non-native species have reestablished, the applicant, or successors in interest, shall submit to the Commission an application for an amendment to this coastal development permit for approval of an amended landscape restoration plan and an extension of the non-native plant removal program for a period not less than two additional years and shall undertake the development approved pursuant to any such amendment.

3. United States Army Corps of Engineers Approval

PRIOR TO COMMENCEMENT OF CONSTRUCTION, permittee shall provide to the Executive Director a copy of a permit issued by United States Army Corps of Engineers, or letter of permission, or evidence that no permit or permission is required. The applicant shall inform the Executive Director of any changes to the project required by the United States Army Corps of Engineers. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

4. Condition Compliance

Within 60 days of Commission action on this coastal development permit application, or within such additional time as the Executive Director may grant for good cause, the applicant shall satisfy all the requirements specified in the conditions hereto that the applicant is required to satisfy prior to the issuance of this permit. Failure to comply with this requirement may result in the institution of enforcement action under the provisions of Chapter 9 of the Coastal Act.

IV. SUBSTANTIVE FILE DOCUMENTS:

1. Southern California Gas Company easement.
2. California Coastal Conservancy, Department of Fish and Game, State Lands Commission. "A planning approach, Ballona restoration and planning, 2005.
3. Pete Bontadelli, Department of Fish and game, MEMORANDUM: Ballona Wetland acreage determination Contained in the Department of Fish and Games September 12, 1991 Memorandum to the Fish and Game Commission, December 20, 1991.
4. Los Angeles County Museum of Natural History, Significant Ecological Areas of Los Angeles County, 1976.
5. Certified Playa Vista Land Use Plan, City of Los Angeles, 1986..
6. Coastal Development Permit No. 5-01-96 (Ballona Wetlands Foundation); 5-90-174(Maguire Thomas Partners-Playa Vista; 5-97-144(Maguire Thomas Partners).
7. Electronic correspondence from Department of Fish and Game, Bradley Henderson, dated November 27, 2006, regarding Ballona Wetlands Ecological Reserve- Del Rey 11 Access Road.

V. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

A. Project Description and Location

Request for after-the-fact approval of unpermitted development consisting of: repair to an existing road including the placing of filter fabric and fill material (crushed granite and dirt) within the existing roadbed of an existing gas well access road, and removal of the crushed gravel that was deposited outside the prism of the original roadway. Excess material will be removed from the site and disposed outside of the coastal zone.

According to Southern California Gas Company (SCG), after heavy rains and prolonged inundated conditions, access to the well was restricted. Because of the condition of the road and the need to access the well site, filter fabric was placed on top of the existing dirt road, and then imported road-base material was placed to raise the level of the road.

During this construction, road base material tapered approximately 6 inches over on either side of the existing road footprint, along a 40 foot section of the road, into the surrounding area, covering an area of approximately 115 square feet.

To address the 115 square feet of encroachment into the area outside of the existing road footprint, the applicant will remove the fill material from the area that extended beyond the original footprint of the access road with use of a backhoe placed on the road, and hand tools to remove any material that encroached into the area outside of the original road footprint. Additional gravel would be added and leveled to create an approximately 9-inch gravel base within the original road footprint, with a 5-inch dirt layer placed on top to ensure that the road will continue to be accessible during wet periods.

The existing access road is in an unpaved dirt road with a gravel base, located off of Jefferson Boulevard, approximately 400 feet northeast of the intersection of Culver Boulevard and Jefferson Boulevard, in Playa del Rey area of the City of Los Angeles (see Exhibit No. 2). The existing access road is approximately 6 inches thick, 12 feet wide and extends approximately 130 feet from Jefferson Boulevard to the gas well (well No. 11). While the surrounding land is owned by the Department of Fish and Game, Southern California Gas Company (SCG) has an easement that allows operation and maintenance of several oil wells, and gas re-injection wells in the area and access to them. The proposed project, including the unpermitted fill is located within SCG's easement.

The unpermitted fill increased the height of the road from 6 inches to a maximum of 1.5 feet in some locations, and resulted in the encroachment of approximately 10 cubic yards of fill into the surrounding area, impacting a total of approximately 115 square feet of surrounding wetland area. The fill extended approximately 6 inches on either side of the original road for a distance of 40 feet; and included a 75 square foot (15 foot by 5 foot) area for a staging area along the shoulder of Culver Boulevard (see Exhibit No. 4). Of the 115 square feet, the area filled along the either side of the road contained wetland vegetation and the area used for staging contained upland vegetation. The applicant is proposing to remove the unauthorized imported fill material and restore the road to its original elevation (6 inches above surrounding area) and footprint, then add fill to create an approximately 14 inch thick (8 inches above original elevation) roadway within the original roadway foot print.

Revegetation of the approximately 115 square foot impacted area will be left to occur naturally from the existing seed bank found within the existing soil and from seasonal flooding. In addition, the applicant is proposing to mitigate wetland impacts by removing invasive vegetation within the surrounding area at a mitigation ratio of 3:1 [mitigation: impacts], based on the total area impacted, and allowing the area to revegetate naturally. The applicant will conduct the mitigation in consultation with the Department of Fish and Game and will monitor the area to ensure that the area is reestablished with native vegetation.

According to the applicant an access road is necessary for inspection and maintenance of the existing well. SCG conducts weekly inspections of the well using standard pickup

trucks and semi-annual maintenance is conducted using slightly larger trucks. Other maintenance activity involves using a vacuum truck to remove rainwater to reduce ponding, and oil rig trucks for well repair work. At this time there are no plans to abandon the well and access will continue to be needed.

B. Environmentally Sensitive Resources

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30240(a) of the Coastal Act states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

The proposed project is located in a portion of the Ballona wetlands, in the area known as Area B. The Ballona wetlands are remnants of a much larger wetland system that historically covered over 1,700 acres. Area B covers approximately 385 total acres and extends from Lincoln Boulevard west to the developed properties along Vista del Mar, and north from the Westchester bluffs to the Ballona Creek Channel (see Exhibit No. 2). Because of past development within Area B, including oil drilling, pipelines, road construction, and farming, only portions of the area contain jurisdictional wetlands (see Exhibit No. 5, Map of wetland areas, based on California Department of Fish and Game wetland determination, December 1, 1982). However, all wetland areas within the Ballona Wetland area are considered environmentally sensitive habitat areas and provide habitat for many species of marine fish, migratory shore birds, and endangered species, including the California least tern and Belding's savannah sparrow. Because of the existence of the wetland and an environmentally sensitive habitat area, the development in the Area B must be found consistent with Sections 30231 and 30240 of the Coastal Act.

The project site includes both a small wetland area and an unpaved road constructed in the early 1960's in what was formerly wetland. The road and well pad is not presently regarded as wetland although the area in which it is located could revert to wetlands if the road and pad were removed and the area restored. Based on a survey conducted by the applicant's consultant, which was reviewed by the Department of Fish and Game, of the 115 square feet impacted, approximately 40 square feet contained wetland vegetation and 75 square feet contained upland vegetation.

The applicant is not seeking after-the-fact authorization for the placement of fill in the wetland and upland areas; the applicant proposes to remove all of the unpermitted fill that extended into the wetlands and upland area outside of the roadway footprint, and then build up the road within the original footprint by a maximum of 8 inches above the existing road height, to a height of 14 inches above the surrounding grade. As part of the applicant's proposed project the impacted areas outside of the existing roadway will be restored through the removal of all imported fill material and the area will be allowed to revegetate naturally from seed bank within the soil and seasonal flooding.

According to the applicant, a reconnaissance-level biological assessment was conducted on April 18, 2005, to determine the extent of impacts to wetland resources and to evaluate the potential hydrological impacts of the fill and the roadway of Well No. 11. Well No. 11 exists on a slightly elevated area, surrounded by ruderal and nonnative grassland vegetation, with seasonal wetland vegetation occurring nearby. Vegetation observed in the area include Italian ryegrass (*Lolium multiflorum*), bristly ox-tongue (*Picris echioides*), pickleweed (*Salicornia* sp.), saltmarsh sand-spury (*Spergularia marina*), mule fat (*Baccharis salicifolia*) and alkali-mallow (*Malvella leprosa*). The seasonal wetland extends approximately 70 feet along the roadway from Jefferson Boulevard, and surrounds the road on both sides (see Exhibit No. 4). The seasonal wetland, which is isolated by Jefferson and Culver Boulevard from other surrounding wetland areas, is considered part of the Ballona Wetland system that is found north of Culver Boulevard and south of Jefferson Boulevard.

The applicant's biological consultant, Karen D. Wilson, from TRC Essex, analyzed four alternative road alignments to determine if there were possible alternative road alignments that would have less of an impact to the wetlands (see Exhibit No. 6 for general alignments of road alternatives). Alternative no. 1 was the existing road alignment with no encroachments (proposed alternative). This alternative impacts an area of approximately 1,560 square feet (12 feet by 130 feet). Since this road alignment is existing there are no impacts to wetland or upland vegetation.

Alternative no. 2, also includes the existing alignment, but includes the unpermitted fill. This alternative would result in 40 square feet of wetland vegetation impacts and 75 square feet of upland vegetation impacts.

Alternative No. 3 would include relocating the access road with access off of Culver Boulevard. This alternative would be a right angle off of Culver Boulevard and result in a 117 foot long and 12 foot wide road. This alternative would have the shortest road from a main road to the well site. Total area impacted would be 1,404 square feet. Of this amount 324 square feet (12 feet by 27 feet) of wetland vegetation would be impacted and 612 square feet (12 feet by 51 feet) of upland vegetation would be impacted.

Alternative No. 4 would be an alignment from Jefferson Boulevard, just west of the existing access road. This alignment would be 130 feet in length by 12 feet wide, and cover an area of 1,560 square feet. This alternative alignment would result in 1,188 square feet (12

feet by 99 feet) of wetland vegetation impacts and 372 square feet (12 feet by 31 feet) of upland vegetation impacts.

Commission staff met out at the site with the applicant and Mr. Brad Henderson from the Department of Fish and Game, to discuss road alignment alternatives and potential impacts. Based on review of the site and submitted report, other than the existing alignment, all alternatives would result in additional impacts to wetland areas. Although there is a possible shorter road alignment (alternative no. 3), creating another road through the wetland would result in additional wetland impacts, as well as access and safety issues. After the site visit and review of the report, Mr. Henderson recommends that the existing road alignment be maintained to minimize impacts to wetlands and other sensitive vegetation communities. Mr. Henderson states that a new alignment would result in impacts to relatively undisturbed wetlands, and the impacts to the area outweigh the benefits gained by relocating the road. He further states that restoration planning for the Ballona wetlands is underway, and removal or realignment of existing major roads in the area and hydrological enhancements are being considered, therefore, it may be more prudent to focus interim restoration opportunities within areas less likely to be affected by the long term Ballona Restoration Plan currently under development.

In addition, Ms. Ruth Lansford, with Friends of Ballona Wetlands, concurs that maintaining the existing road would be the least disruptive in terms of impacts to wetland area. In terms of traffic safety, the Los Angeles Department of Transportation prefers the existing road, because Jefferson Boulevard, where the existing road comes off of, carries less traffic than Culver Boulevard. So any access from Culver Boulevard would not be supported by their Department due to traffic and safety issues, and any access placed closer to the intersection along Jefferson Boulevard would create additional delays and disruptions to traffic flow.

Therefore, based on the alternative analysis and discussions with Department of Fish and Game, the existing road alignment is the best alternative at this time. Additionally, the removal of the fill material, that extends beyond the original road footprint and proposed mitigation, will help restore the area and allow it to revegetate and help reduce the spread of non-native invasive plants.

In addition to the direct impact fill has on the wetland area, Commission staff was also concerned with imported material creating a hydrological barrier that would impact the water flow/circulation in the immediate area and adversely impact the surrounding seasonal wetlands outside of the fill area. The Department of Fish and Game has reviewed this issue and has indicated that the removal of the unpermitted fill will not have a significant impact on the existing wetlands, and, based on the prior condition of the road, permeability of the coarse gravel proposed for the road bed, and observations over the last 20 years, the Department does not believe that the project will adversely affect water flow/circulation in the area. The Department further states that the area impacted by fill would likely be recolonized by species similar to those that occurred previously. However, they expressed concern that the area could be colonized within the first year by invasive species, such as pampas grass and castor bean, and that the site should be monitored so

that invasive plants do not colonize the area and prevent the establishment of native plants. Therefore, to ensure that invasive plants do not colonize the fill impacted area to be restored, as well as the proposed peripherally impacted area of mitigation, the applicant shall monitor the area for two years and provide a progress report on the revegetation of the area and a vegetation monitoring and invasive plant removal plan prepared by a licensed professional with expertise in wetland restoration. All non-native plants found in the impacted and peripherally impacted areas within the first two year shall be removed with hand tools. Such plan shall be reviewed and approved by the Department of Fish and Game.

As stated, the wetlands provides habitat for many bird species, including the Belding sparrow, which is listed as an endangered species. The Beldings nest over ½ mile to the west of the project site, and the construction activity, which will take approximately 3-4 days to complete, will not have an impact on the Belding's nesting activity.

As conditioned, the project will not have an adverse impact on the wetlands, and is consistent with Section 30231 and 30240 of the Coastal Act.

C. Unpermitted Development

Development has occurred on site without benefit of the required coastal development permit. Unpermitted development on the site includes the placement of fill material approximately 6 inches over on either side of the existing road footprint into the surrounding wetland and upland area and increasing the elevation of the existing road approximately 1.5 feet through the placement of fill material on the road. Although unpermitted development has taken place prior to submission of this permit application, consideration of the permit application by the Commission has been based solely on the consistency of the proposed development with the policies of Chapter 3 of the Coastal Act. Approval of this permit does not constitute a waiver of any legal action with regard to the alleged unpermitted development, nor does it imply any finding of legality of any development undertaken on the subject site without a coastal development permit.

D. Local Coastal Program

Section 30604 (a) of the Coastal Act states that:

Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3.

In November 1986, the Commission certified, with suggested modifications, the land use plan portion of the Playa Vista segment of the City of Los Angeles' Local Coastal Program after the City annexed the area. The proposed project is located within the City of Los

Angeles' planning area of Playa Vista. While there is a certified land use plan for the area, the City of Los Angeles does not have a certified Local Coastal Program for the Playa Vista area. The City of Los Angeles submitted its Local Coastal Program in March 1981. The Commission denied the submitted LCP on December 18, 1981. The City has not planned the submittal of a revised LCP.

The Ballona wetlands area, including Area B, has recently been acquired by the Department of Fish and Game. Presently the California Coastal Conservancy, the State Lands Commission and the Department of Fish and Game are developing a restoration plan to create a variety of native habitats on the Ballona wetlands and associated upland areas, including the project site. According to the Restoration Project website¹, the restoration project area includes about 600 acres owned by the state of California on both sides of Ballona Creek. Meetings with stakeholders, development of goals, and biological assessments began in the fall of 2005. The present project as proposed to return the area to the conditions that existed before the unpermitted development, does not change any land use or any planning decision regarding the restoration of the marsh. The project as proposed and conditioned will not have any impacts on the marsh and is consistent with the habitat policies of the Coastal Act. The Commission, therefore, finds that the proposed project is consistent with the Chapter 3 policies of the Coastal Act and will not prejudice the ability of the City to prepare a Local Coastal Program consistent with the policies of Chapter 3 of the Coastal Act as required by Section 30604(a).

E. California Environmental Quality Act

Section 13096(a) of the Commission's administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect which the activity may have on the environment.

As conditioned, there are no feasible alternatives or mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the proposed project is found consistent with CEQA and the policies of the Coastal Act.

¹ <http://www.scc.ca.gov/Ballona/index.html>,



Site



LOS ANGELES AREA



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HUNTINGTON BI

EXHIBIT NO. 1
 APPLICATION NO.
5-06-L74
Regional Map



EXHIBIT NO. **2**
 Application Number
5-06-174
Vicinity Map
 California Coastal Commission

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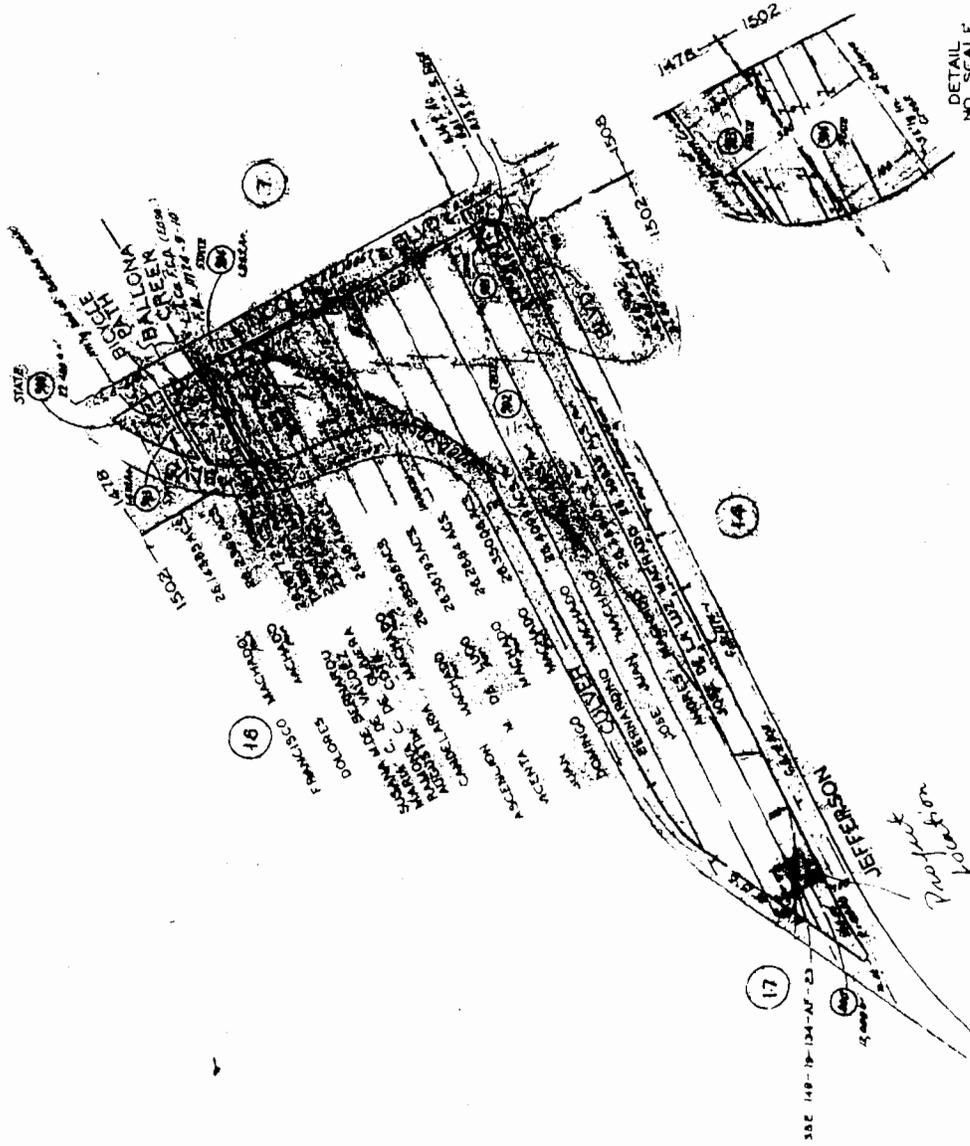
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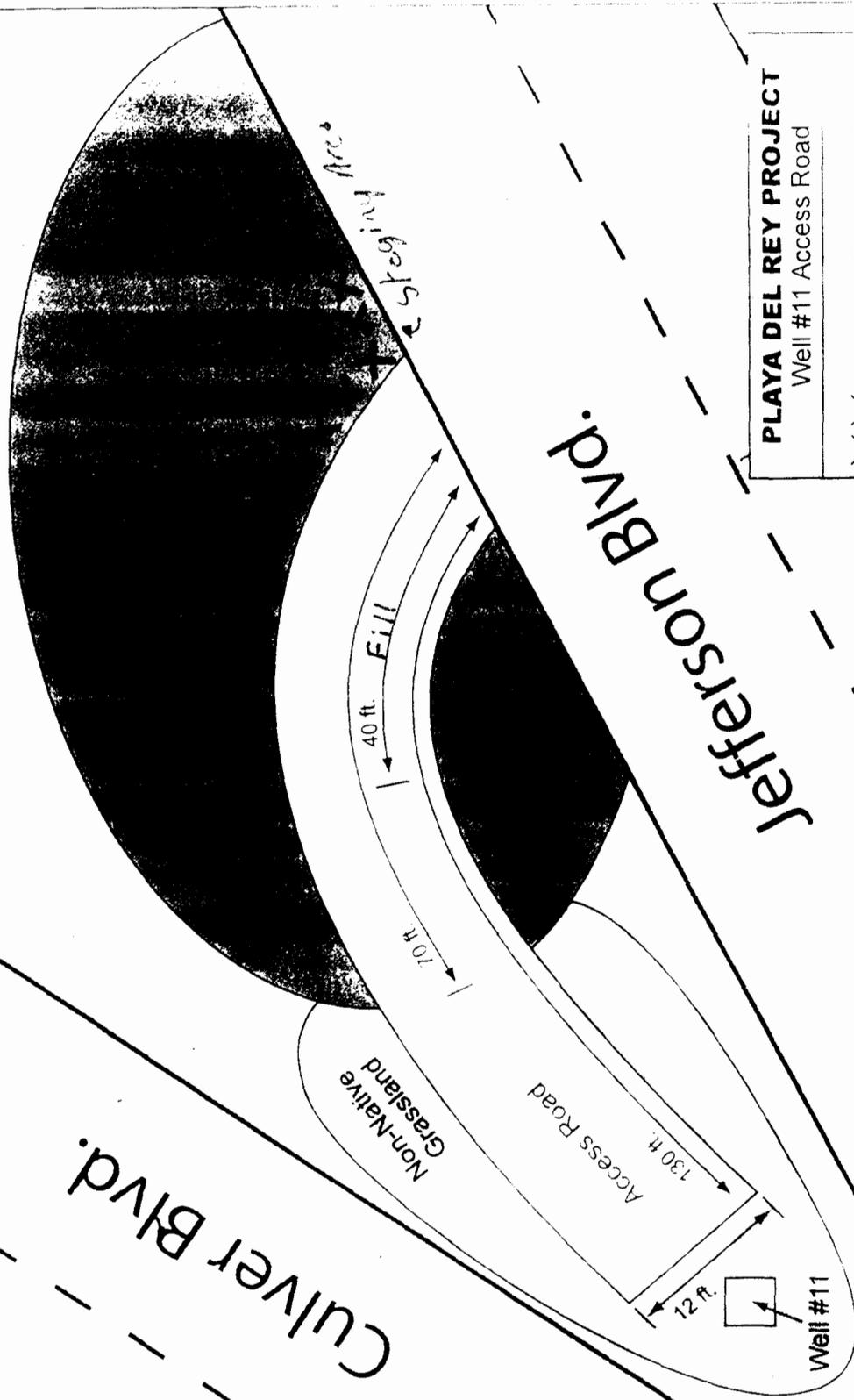
DETAIL
NO SCALE

RANCHO LA BALLENA S.C.O. 5830 C.F. 78
PART OF THE RANCHO LA BALLENA ALLOTTED
TO THE HEIRS OF JUSTIN MACHADO M.R. 3-204-208

MAR 02 2004
ASSESSOR'S MAP
COUNTY OF LOS ANGELES CALIF.

EXHIBIT NO. 3
Application Number 5-06-174 Parcel Map
California Coastal Commission

Not Assessed



PLAYA DEL REY PROJECT
Well #11 Access Road

- XX Impacted Seasonal Wetland
- Seasonal Wetland
- Non-Native Grassland

Note: Drawing not to scale

EXHIBIT NO.	4
Application Number	5-05-174
	Site Plan
California Coastal Commission	

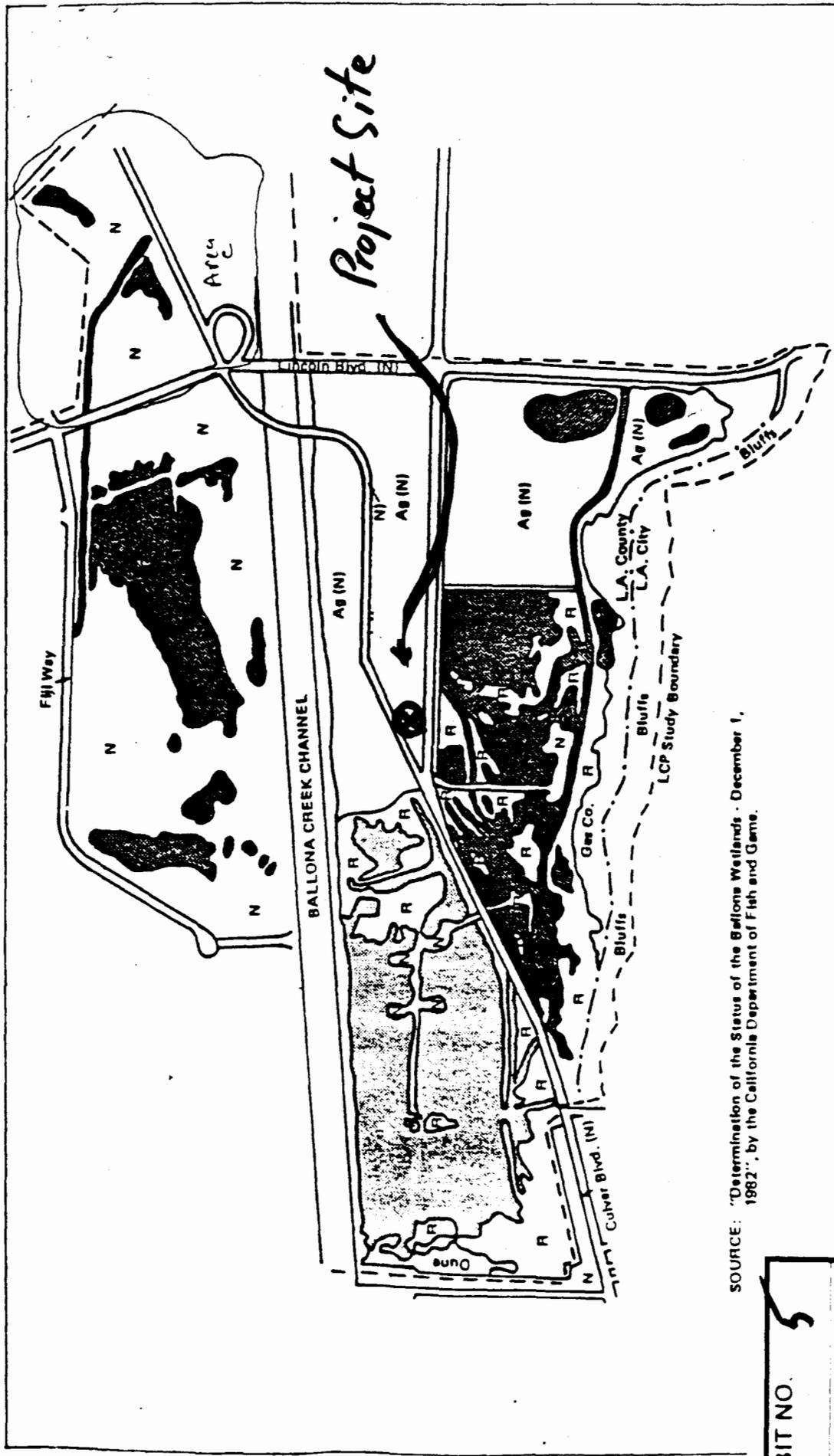
2005

Diagram Not to Scale

map 14

PRESENT STATUS OF THE BALLONA REGION

- Non-degraded wetland
- Feasibly restorable former wetland
- Former wetlands Agricultural Field
- Degrated wetland
- Former wetland not feasibly restorable
- Dune & Bluffs
- Environmentally sensitive upland



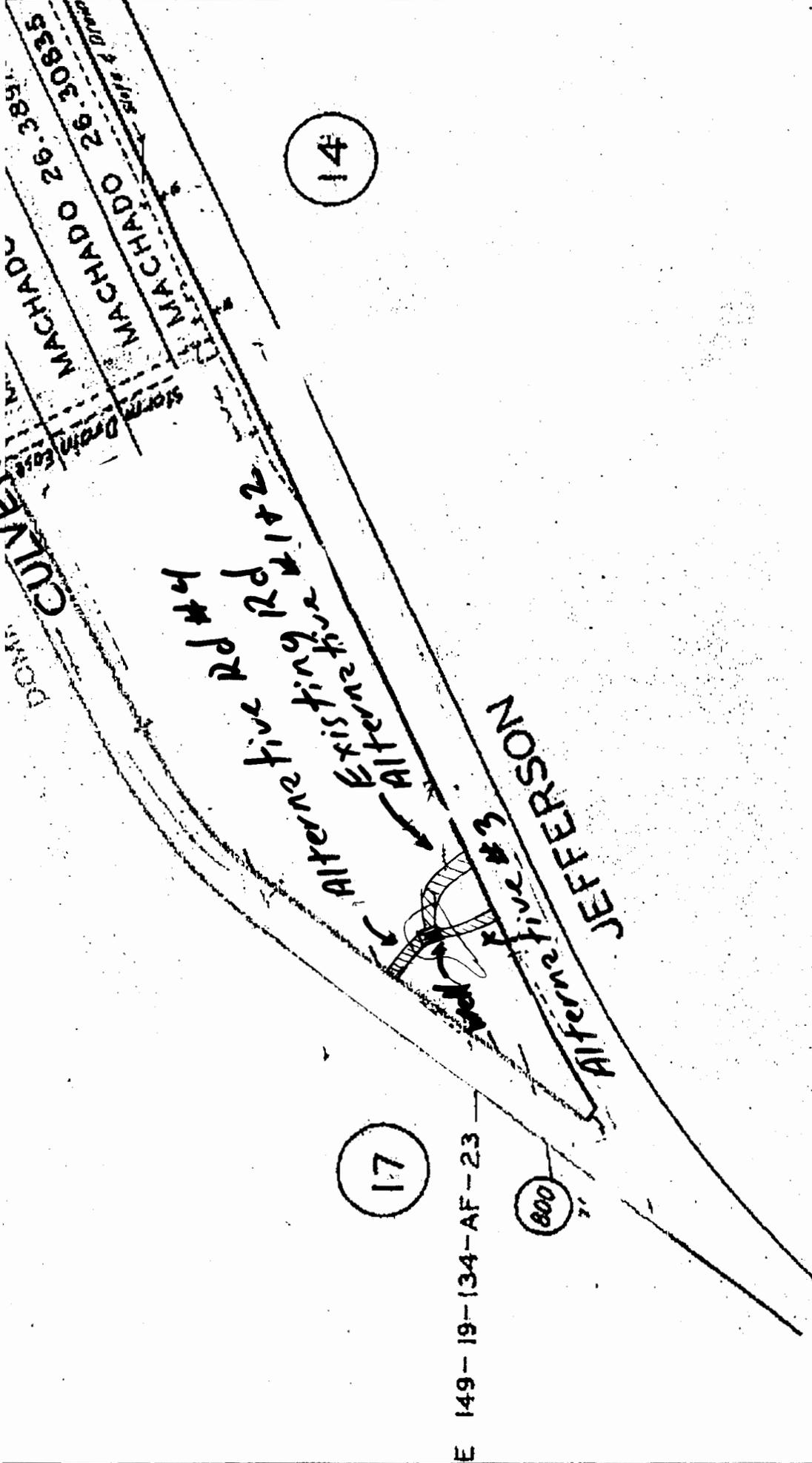
SOURCE: "Determination of the Status of the Ballona Wetlands - December 1, 1982", by the California Department of Fish and Game.

EXHIBIT NO. 5

Application Number 5-05-774

Wetland Map

17 Feb 1987



E 149-19-134-AF-23

EXHIBIT NO.	6
Application Number	506-174
Alternative Rd.	Alternative Rd.
Alignments	Alignments
California Coastal Commission	

RANCHO LA BALLONA S.C.C. 5630
 PART OF THE RANCHO LA BALLONA AL
 TO THE HEIRS OF AUGUSTINA MACHA